

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINADEC 12 '24 PM 4:05
RCVD - USDC FLO SCTheresa Denise Woodberry

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Ruiz Food
McLeod

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Theresa Denise Woodberry

Street Address

3602 Bass Ln

City and County

Timmons ville

State and Zip Code

SC 29161

Telephone Number

(803) 240-7396

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

Ruiz Foods

Job or Title
(if known)

Street Address

2557 Florence Harilee Blvd,

City and County

Florence SC

State and Zip Code

SC 29506

Telephone Number

Defendant No. 2

Name

McLeod

Job or Title
(if known)

Street Address

City and County

Florence

State and Zip Code

SC

Telephone Number

Defendant No. 3

Name

Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

Defendant No. 4

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Theresa Woodberry is a citizen of
the State of (name) South Carolina

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name)
_____.

*(If more than one plaintiff is named in the complaint, attach an additional
page providing the same information for each additional plaintiff.)*

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Ruiz Foods, is
incorporated under the laws of the State of (name)
_____, and has its principal place of
business in the State of (name) _____. Or is
incorporated under the laws of (foreign nation)
_____, and has its principal place of
business in (name) _____.

*(If more than one defendant is named in the complaint, attach an
additional page providing the same information for each additional
defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

yes

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I was hired at Ruiz Foods 4/20/23
and got injured on May/3/23. (See next
page). in which the defendant broke my
Civil rights. I have cooperated with both
Ruiz and McLeod to not get the adequate
treatment I deserve. which left both parties at fault

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I was discriminated and retaliated against
among other things, I don't want to file
a lawsuit because nothing about this is
fun. I told Ruiz Foods HR that I didn't
have any intentions of suing, but I was told
it's only workers' comp. I was release due
to constructive discharge. And even that
wasn't enough. Ruiz Foods did not provide
me proper treatment and now I'm left disable
I would like to ask the court relief of 1,500,000

Dec 3 2024

My name is Theresa Denise Woodberry

I was hired at Ruiz Foods on April 20 23 and got injured on May 3 2023 due to a conveyor belt snagged my glove and pulled me through. Upon returning to work I was subjected many issues under the Civil Rights Act Vill and so much more. Please see below:

Discrimination code section 1-13-80

Retaliation 27-40—910

IIED code section 15-78-30 (f)

Mental Anguish code section 15-32-210

Psychological Abuse Code section 43-35-10

Harassment code section 16-3-1700 (B)

Denial of Accommodations section code 1-13-80

Hostile Work environment section code 1-13-10 under code section 42 U.S.C

Constructive Discharge Code section 41, chapter one

Negligence by way of unsafe working conditions code section 29 CFR 1960.28

Loss of enjoyment of life code section 42-9-440

Workers' Comp Fraud code section 42-9-440

Conspiracy before and after the fact code section 16-13-10

Defamation of character code section 28 U.S.C 4101

Wage Theft code section 41-10-80

Libel section code 28

Exploitation of a vulnerable adult code section 43-35-13

McLeod

Loss of enjoyment of life code section 42-9-440

Conspiracy before and after the fact code section 16-13-10

Forging code section 16-13-10

Defamation of character code section 28 U.S.C 4101

Mental Anguish code section 15-32-210

Loss of enjoyment of life code section 42-9-440

Libel section code 28

Medical Malpractice / leaving me disable

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

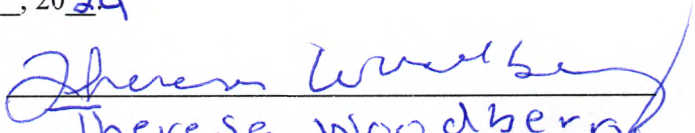
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12-03, 2024

Signature of Plaintiff

Printed Name of Plaintiff


Theresa Woodberry

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____